

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

RALPH MAXWELL

Case No. 22-MJ-527

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ described in Attachment A _____ in the county of Montgomery and Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:*Code Section**Offense Description*

Title 18, U.S.C. Section 2113(d)

Armed Bank Robbery

Title 18, U.S.C. Section 2113a

Bank Robbery (2 counts)

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

/s James Finnegan*Complainant's signature*

James Finnegan, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/29/2022

/s/ Lynne A. Sitarski*Judge's signature*City and state: Philadelphia, PA

Hon. Lynne A. Sitarski, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, James F Finnegan, being duly sworn under oath and deposed, state the following:

1. I have been employed by the Federal Bureau of Investigation for the last 16 years as a Special Agent. I am presently assigned to the Violent Crimes Task Force (VCTF) where I investigation violations of state and federal laws related to commercial robberies, bank robberies, kidnappings, fugitives, and major theft investigations of pharmaceutical drugs, among other violations of the law. The statements in this affidavit are based on my review of police reports, the recovery of physical evidence from the crime scenes, and information provided to me by law enforcement personnel. These statements are true and correct to the best of my knowledge, information, and belief.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging RALPH MAXWELL ("MAXWELL") with one count of violating Title 18, United States Code, Section 2113(d) (armed bank robbery); and two counts of violating Title 18, United States Code, Sections 2113(a) (bank robbery) as set forth in more detail in Attachment A hereto, which is incorporated herein.

3. On Friday, February 25, 2022, at approximately 1:06 p.m., an unknown black male, hereinafter referred to as UNSUB, robbed the Wells Fargo Bank, 75 East City Avenue, Bala Cynwyd, Pennsylvania, by point of demand note. After entering the bank, the UNSUB waited for a teller station to open. Once the victim/teller who was working in teller station number 3 was open, the UNSUB walked up to her window and slid a piece of paper to her. The victim/teller read the note, which read, "THIS IS A ROBBERY, DON'T DO ANYTHING STUPID, NO ONE HAS TO DIE." After reading the note, the victim/teller looked up at the offender who verbally stated, "don't do anything stupid" and threw a fanny back in her direction.

The victim/teller then began to put the money from her top drawer in the into the fanny pack.

After putting the money into the fanny pack the victim/teller handed it back to the UNSUB, who looked inside it and then looked back at the victim/teller. The victim/teller told the UNSUB that the second drawer was locked. The UNSUB then stated, "I'm sorry" before running out of the bank.

4. The victim/teller described the offender as a light completed black male, approximately 6' tall, slim build, wearing light-colored blue jeans, a black jacket, and a black ski mask.

5. Detectives and Police Officer's from Lower Merion Police Department responded to Wells Fargo Bank and processed the scene. The victim/teller was interviewed, the video surveillance still images were recovered, and the demand note was photographed and recovered. The bank completed an audit was completed and reported a loss of \$6,840 dollars.

6. On Tuesday, March 1, 2022, at approximately 11:02 a.m., an unknown black male, hereinafter referred to as UNSUB, robbed the American Heritage Credit Union, 2185 Bridge Street, Philadelphia, Pennsylvania, by point of demand note. The UNSUB entered the bank branch, and approached victim teller J.P. The UNSUB walked up to J.P. at teller window number two and placed a demand note under the glass. J.P. read the note which said, "Empty all the money out of the drawer and put it into the bag, stay calm, I'm armed." The UNSUB then took off a fanny-pack style bag he had across his chest and pushed it under the glass. J.P. took out a stack of money, at which time the UNSUB made a hand gesture telling J.P. to fan out the money in front of him. J.P. complied, to which the UNSUB said, "is that everything?" J.P. said "yes," and the UNSUB took the bag and the demand note and fled the bank on foot, getting into the front passenger seat of a black Infiniti Coupe with Pennsylvania License Plate number JGV-

9477. After the robbery, Philadelphia police department officers responded to the crime scene for processing. Once on scene, the victim and witnesses were interviewed, video surveillance footage was obtained along with still photographs. The demand note was not recovered. The UNSUB was described as black male, skinny/thin build, mid-20s in age, 6' in height, wearing a black face mask, black baseball hat turned backwards, black hooded sweatshirt, blue jeans, carrying a fanny-pack style bag across his chest. The UNSUB stole \$1,722.

7. Agents and task force officers reviewed surveillance video from the bank and verified the license plate of the vehicle used by the UNSUB to flee the bank following the robbery. The vehicle is registered to P. R., 135 Roselyn Street, Philadelphia, Pennsylvania. According to open-source records, P.R. is MAXWELL's mother. A review of Philadelphia and Pennsylvania records showed that MAXWELL was stopped in the Infiniti in Lower Merion in 2019. In 2016, MAXWELL was arrested for drug possession and provided his address as 135 Roselyn Street, Philadelphia, Pennsylvania.

8. On Friday, March 18, 2022, at approximately 10:27 a.m., an unknown black male, hereinafter referred to as UNSUB, robbed the Wells Fargo Bank, 101 E. Olney Avenue, Philadelphia, Pennsylvania, by point of gun. The UNSUB entered the bank branch, and approached victim teller, G.R. The UNSUB walked up to G.R. and placed a demand note under the glass. G.R. read the note which said. "THIS IS A ROBBERY!!!! Quickly! and Quietly put \$20,000 in the bag. NO DYE, NO TRACER BILLS, NO ALARMS UNTIL I'M GONE!! OR, I WILL SHOOT THE FIRST PERSON BEHIND ME!! Everything depends on YOU!! Please Don't let anyone DIE!! NO ALARMS-I HAVE A SCANNER. NO GAMES STAY QUIET FAST I will check money before I leave." The UNSUB gave G.R. a fanny-pack style bag he had by pushing it under the glass. G.R. took the bag and walked down the teller line and quietly told

the other tellers they were being robbed and to act like they were putting money into the bag. G.R. and teller A.G. went into the vault, locked themselves inside, and activated the alarm. The UNSUB then walked to teller I.R. The UNSUB slapped his hand onto the counter in front of I.R. and stated, "Hurry up, hurry up, you're taking too long!" I.R. said "she is coming, she went to the vault to get it for you." The UNSUB walked back to G.R.'s window, then walked back to I.R.'s window and stated, "Don't play with me" while holding up his hooded jacket and displaying what appeared to be a firearm on his hip. I.R. opened her drawer and took out approximately \$500 and handed it to the UNSUB. The UNSUB took the money and walked toward the exit. The UNSUB stopped inside the ATM vestibule, looked back at I.R. for a few seconds, and left the bank on foot. The UNSUB stole \$488.

9. After the robbery, Philadelphia police department officers and members of the Philadelphia Division Violent Crimes Task Force responded to the crime scene for processing. Once on scene, the victim and witnesses were interviewed, video surveillance footage was obtained along with still photographs. The demand note was recovered along with the fanny pack the UNSUB gave the teller to fill with money. The fanny pack used during this robbery matches the fanny pack seen on surveillance video during the March 1 robbery of Wells Fargo Bank. The agents' review of the bank's surveillance video, revealed that the UNSUB got into a black Infiniti Coupe with Pennsylvania License Plate number JGV-9477. The UNSUB was described as light skin black male, skinny/thin build, 6' in height, wearing a black face mask pulled down under his chin, white hard hat, black hooded sweatshirt, dark pants, with a silver and black walkie-talkie radio on his belt.

10. Immediately following the March 18, 2022, robbery of Wells Fargo Bank, Philadelphia Police radio broadcasted the description of the UNSUB and license plate of the

vehicle over the radio. Officer arrived at 135 Roselyn Street and located the black Infiniti vehicle parked in the rear of the property, in front of the basement entrance. The residence was cleared of all occupants and a search was conducted via written consent provided by the property owner, P.R. Agents and officers limited their search to the basement area only, because according to P.R., this was MAXWELL's area.

11. Inside the basement, close to the rear door, agents and task force officers recovered a white hard hat, black hooded jacket, black ski mask and silver and black walkie-talkie radio like the items worn by the UNSUB during the Wells Fargo robbery. Additional items recovered include a gun box belonging to a Glock 43 type handgun and light blue jeans similar to the pants the UNSUB wore in the March 1, 2022, American Heritage Credit Union robbery.

12. The deposits of both Wells Fargo Banks and American Heritage Credit Union referenced above are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the bank robberies described above.

10. On March 29, 2022, agents and task force officers of the Philadelphia VCTF conducted surveillance in the vicinity of 5223 Burton Street, Philadelphia. This location was derived from a tip called in by a former employer, who provided MAXWELL's Instagram account name. Open-source review of Instagram revealed MAXWELL's girlfriend resided at the address. Officers observed MAXWELL leaving the location on March 29, 2022, and they arrested him, on an arrest warrant issued on March 16, 2022, in Philadelphia..

13. MAXWELL gave a statement to FBI agents after waiving his *Miranda* rights where he confessed to all three bank robberies described above. MAXWELL denied possessing or displaying a firearm during any of the robberies.

14. Based on the information set forth above, I believe there is probable cause to charge RALPH MAXWELL one count of armed bank robbery, in violation of Title 18, United States Code, Section 2113(d), and two counts of bank robbery in violation of Title 18, United States Code, Section 2113(a).

Respectfully Submitted,

/s/ James Finnegan
JAMES F. FINNEGAN
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me March 29, 2022

/s/ Lynne A. Sitarski
Honorable Lynne A. Sitarski
United States Magistrate Judge

ATTACHMENT A – DESCRIPTION OF COUNTS

COUNT ONE

On or about February 25, 2022, in Bala Cynwyd, in the Eastern District of Pennsylvania, defendant RALPH MAXWELL knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Wells Fargo Bank, located at 5 East City Avenue, Bala Cynwyd, Pennsylvania, lawful currency of the United States, that is, approximately \$6,480 belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant Ralph MAXWELL knowingly and unlawfully took currency in violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

On or about March 1, 2022, in Philadelphia, in the Eastern District of Pennsylvania, defendant RALPH MAXWELL knowingly and unlawfully, by force and violence, and by intimidation, took from employees of American Heritage Credit Union, located at 2185 Bridge Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,772 belonging to, and in the care, custody, control, management and possession of American Heritage Credit Union, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant Ralph MAXWELL knowingly and unlawfully took currency in violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

On or about March 18, 2022, in Philadelphia, in the Eastern District of Pennsylvania, defendant RALPH MAXWELL knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Wells Fargo Bank, 101 E. Olney Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$488.00 belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant Ralph MAXWELL knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Wells Fargo Bank, and other persons, by use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Section 2113(d).